

BORRELLI & ASSOCIATES

P.L.L.C.

www.employmentlawyernewyork.com

655 Third Avenue
Suite 1821
New York, NY 10017
Tel. No. 212.679.5000
Fax No. 212.679.5005

1010 Northern Boulevard
Suite 328
Great Neck, NY 11021
Tel. No. 516.248.5550
Fax No. 516.248.6027

July 30, 2014

Via ECF and Electronic Mail

The Honorable Lorna G. Schofield
United States District Judge of the
Southern District of New York
40 Foley Square
New York, New York 10007-1312

Re: *Antonia Santana v. Jorge Brown, et al.*
Docket No.: 14-CV-04279 (LGS)

Dear Judge Schofield:

We represent the Plaintiff in the above-referenced matter. We write to request an extension of time to submit a Proposed Civil Case Management Plan and Scheduling Order and to adjourn the Initial Conference scheduled for August 7, 2014. Plaintiff is unable to submit a plan because the Defendants have failed to appear and respond to Plaintiff's counsel.

On June 24, 2014, Plaintiff sent notices of this lawsuit and waivers of service of the summons and complaint to Defendants Jorge Brown and Ana Marie Brown. With those requests, Plaintiff served the Initial Conference Order and the Court's Individual Rules. (Dkt. No. 5). The waivers were due on July 24, 2014, and the Defendants did not respond. Plaintiff sent the Summons and Complaint to a process server today for service on the Defendants.

Due to the Defendants' conduct, Plaintiff cannot submit a Proposed Civil Case Management Plan and Scheduling Order by tomorrow's due date. Plaintiff respectfully requests that the Court adjourn the Initial Conference scheduled for August 7th until a date during the last week of September. Plaintiff believes that she will be able to serve the Complaint and submit a Proposed Civil Case Management Plan and Scheduling Order before that time.

This is the first request for an adjournment and extension of time.

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We thank the Court for its consideration of this matter.

Respectfully submitted,

s/Michael J. Palitz
Michael J. Palitz, Esq.
For the Firm

cc: Hon. Lorna G. Schofield (via electronic mail)
Defendants Jorge Brown and Ana Marie Brown (via first-class mail)